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May 7, 2020

**VIA ECF**

Honorable Steven M. Gold  
United States Magistrate Judge  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: Sampson v. International Union of Operating Engineers**  
**Case No.: 19 CV 04946**

Dear Magistrate Judge Gold:

We are counsel to defendant in this action. As you may recall, during our telephonic conference on April 20, 2020 in connection with plaintiff's motion to compel defendant's database, plaintiff was ordered to provide a factual basis for the predicate of his claim by May 4, 2020, and defendant was provided with an opportunity to respond by May 11, 2020. We are in receipt of plaintiff's submission, inclusive of eight exhibits, which we are sorting through. We write to request a one week extension until May 18, 2020 to file defendant's response, given ongoing issues with coordinating with our client. Plaintiff consents to this request.

Thank you for your consideration.

Respectfully submitted,

*/s/ Bran C. Noonan*

Bran C. Noonan

CC: all counsel of record (by ECF)

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